

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF ANNA PORTO IN SUPPORT OF
DEFENDANT'S MOTION TO COMPEL**

I, Anna Porto, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California and admitted to practice before this Court. I am an attorney at the law firm of Keker, Van Nest and Peters, LLP and counsel for Defendant Google LLC, (“Google”) in the above-captioned action.

2. I submit this declaration in support of Google’s Memorandum of Law in support of its Motion to Compel. I have personal knowledge of the facts stated herein and, if called as a witness, I could testify to them competently under oath.

3. Attached as **Exhibit 1** is a true and correct copy of Defendant Google LLC’s First Set of Requests for Production of Documents and Things to Plaintiff Singular Computing (Nos. 1-71), dated July 13, 2020.

4. Attached as **Exhibit 2** is a true and correct copy of excerpts of Plaintiff’s Response to Defendant’s First Request for Production of Documents and Things (Nos. 1-71), dated August 26, 2020.

5. Attached as **Exhibit 3** is a true and correct copy of Defendant Google LLC’s First Set of Interrogatories to Plaintiff Singular Computing (Nos. 1-12), dated July 13, 2020.

6. Attached as **Exhibit 4** is a true and correct copy of excerpts of Plaintiff’s Objections and Responses to Defendant’s First Set of Interrogatories (Nos. 1-12), dated August 26, 2020.

7. Attached as **Exhibit 5** is a true and correct copy of excerpts of Plaintiff’s Supplemental Responses and Objections to Defendants’ Interrogatories (Nos. 8 and 11), dated December 9, 2020.

8. Attached as **Exhibit 6** is a true and correct copy of Defendant Google LLC’s Second Set of Interrogatories to Plaintiff Singular Computing (Nos. 13-14), dated November 30, 2020.

9. Attached as **Exhibit 7** is a true and correct copy of Plaintiff’s Responses to Defendant’s Second Set of Interrogatories (Nos. 13-14).

10. Attached as **Exhibit 8** is a true and correct copy of an excerpt of Exhibit A, Contention Claim Chart for U.S. Patent No. 9,218,156, dated September 4, 2020.

11. Attached as **Exhibit 9** is a true and correct copy of an excerpt of Exhibit B, Contention Claim Chart for U.S. Patent No. 8,407,273, dated September 4, 2020.

12. Attached as **Exhibit 10** is a true and correct copy of an excerpt of Exhibit C, Contention Claim Chart for U.S. Patent No. 10,416,961, dated September 4, 2020.

13. Attached as **Exhibit 11** is a true and correct copy of a letter from Brian Seeve to Matthias Kamber, dated September 16, 2020.

14. Attached as **Exhibit 12** is a true and correct copy of a letter from Matthias Kamber to Brian Seeve, dated September 21, 2020.

15. Attached as **Exhibit 13** is a true and correct copy of an email from Matthias Kamber to Singular's Counsel, dated October 22, 2020.

16. Attached as **Exhibit 14** is a true and correct copy of an email from Brian Seeve to Matthias Kamber, dated November 18, 2020.

17. Attached as **Exhibit 15** is a true and correct copy of a letter from Matthias Kamber to Brian Seeve, dated December 11, 2020.

18. Attached as **Exhibit 16** is a true and correct copy of an email from Anna Porto to Kevin Gannon, dated October 2, 2020.

19. Attached as **Exhibit 17** is a true and correct copy of a letter from Brian Seeve to Matthias Kamber, dated December 22, 2020.

20. Attached as **Exhibit 18** is a true and correct copy of a letter from Matthias Kamber to Paul Hayes, dated September 10, 2020.

21. Attached as **Exhibit 19** is a true and correct copy of an email chain between Google and Singular's counsel for the period of October 28, 2020 through November 30, 2020.

22. Attached as **Exhibit 20** is a true and correct copy of documents numbered SINGULAR-00003903, SINGULAR-00004086, and SINGULAR-00011935 and produced in this litigation.

23. Attached as **Exhibit 21** is a true and correct copy of a document numbered SINGULAR-00004320 - SINGULAR-00004324 and produced in this litigation.

24. Attached as **Exhibit 22** is a true and correct copy of a document numbered SINGULAR-00006430 and produced in this litigation.

25. Attached as **Exhibit 23** is a true and correct copy of a document numbered SINGULAR-00005112 and produced in this litigation.

26. Attached as **Exhibit 24** is a true and correct copy of a document numbered SINGULAR-00003275 and produced in this litigation.

27. Attached as **Exhibit 25** is a true and correct copy of a document numbered SINGULAR-00003276 and produced in this litigation.

28. Attached as **Exhibit 26** is a true and correct copy of a document numbered SINGULAR-00004377 - SINGULAR-00004388 and produced in this litigation.

29. Attached as **Exhibit 27** is a true and correct copy of a document numbered SINGULAR-00004345 - SINGULAR-00004351 and produced in this litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on January 14, 2021 at San Francisco, California.

/s/ Anna Porto

Anna Porto

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed
Nathan R. Speed